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Attorneys for Defendants Leap Forward Gaming, Inc.,

Mohammad Ali Saffari, Perry Cobb, and Bruce Cunningham

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PEERLESS INDEMNITY INSURANCE
COMPANY, a foreign company,

Plaintiff,

vs.

LEAP FORWARD GAMING, INC., a Nevada
company; MOHAMAD ALI SAFFARI, a
Nevada resident; PERRY COBB, a Nevada
resident; and BRUCE CUNNINGHAM, a
Nevada resident,

Defendants.

CASE NO.: 2:15-cv-02390-APG-CWH

STIPULATION AND ORDER EXTENDING TIME
(First Request Pursuant to Local Rule 16.1)

Plaintiff Peerless Indemnity Insurance Company and Defendants Leap Forward Gaming, Inc., Mohamad Ali Saffari, Perry Cobb, and Bruce Cunningham (collectively, the “Defendants”), by and through their undersigned counsel, do hereby stipulate and agree that the Defendants should have an additional three weeks extension of time to and including Tuesday, March 1, 2016, in which to file a response to the Plaintiff’s Complaint filed in the above-entitled action.

Good cause exists for such an extension, because the Defendants herein are currently engaged in serious good-faith settlement negotiations with International Game Technology and IGT (“IGT”), Plaintiffs in Case No. 2:15-cv-01842-APG-VCF, filed in the United States District Court for the District of Nevada. The parties stipulate and agree that an extension will help

1 facilitate the pending settlement discussions. The parties certify that this stipulation is made in
 2 good faith and not in an effort to cause delay. The Defendants have met on two occasions for
 3 settlement discussions with IGT and have exchanged proposals. A settlement offer has been
 4 made and it is being evaluated. Accordingly, the Defendants herein need an additional three
 5 weeks in which to respond to Plaintiff's Complaint and are optimistic that settlement is feasible.
 6

7 The time for the Defendants to file a response to the Complaint filed herein is presently
 8 Tuesday, February 9, 2016. The Plaintiff and the Defendants stipulate and agree that the time for
 9 the Defendants to file a response to the Complaint should be extended to and including March 1,
 10 2016.

11 DATED this 9th day of February, 2016.

12
 13 ROBISON, BELAUSTEGUI, SHARP & LOW
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 15 71 Washington Street
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17 /s/ Kent R. Robison
 18 KENT R. ROBISON – NSB #1167
 19 Attorneys for Defendants Leap Forward Gaming, Inc.,
 20 Mohamad Ali Saffari, Perry Cobb, and Bruce Cunningham

21 DATED this 9th day of February, 2016.

22 FORAN GLENNON PALANDECH
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26 /s/ Justin S. Hepworth
 27 AMY M. SAMBERG – NSB #10212
 28 JUSTIN S. HEPWORTH – NSB #13512
 Attorneys for Plaintiff
 Peerless Indemnity Insurance Company

ORDER

IT IS SO ORDERED.

DATED February 11, 2016